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USDOC FOR 532/OEA/LHINES/ADYSON  
USDOC FOR 3132 FOR FCS/OIO REGIONAL DIRECTOR PATRICK SANTILLO  
BICE FOR OFFICE OF STRATEGIC INVESTIGATIONS

SIPDIS

E.O. 12958: N/A

TAGS: [BMGT](#) [BEXP](#) [HK](#) [ETRD](#) [ETTC](#)

SUBJECT: EXTRANCHECK: POST SHIPMENT VERIFICATION: CAM IC  
INTERNATIONAL LIMITED

REF: A) USDOC 06567 B) HK 01087 (2008)

1. Unauthorized disclosure of the information provided below is prohibited by Section 12C of the Export Administration Act.

12. As per reftel A request and at the direction of the Office of Enforcement Analysis (OEA) of the USDOC Bureau of Industry and Security (BIS), Export Control Officer Philip Ankel (ECO) attempted to conduct a post shipment-verification (PSV) at CAM IC International limited, Rm. 1405 Chung Kiu Commercial Building, 47-51 Shantung Street, Hong Kong (CAM-IC). The items in question are 200 REI exported to CAM IC on or about April 5, 2008 and valued at USD 38,000. On the applicable shippers export declaration (SED), these items are classified under export control classification number (ECCN) 3A001 and, if properly classified, would be controlled for national security (NS) reasons. These appear to be items that may be shipped license-free to Hong Kong but would, in virtually all circumstances, require a license for shipment to mainland China. The exporter was Rochester Electronics of Newburyport, Massachusetts.

13. According to the Hong Kong Companies Registry, CAM IC does not exist as a registered company in Hong Kong. A domain search of the company's apparent web site ([www.cam-ic.com](http://www.cam-ic.com)) reveals that the domain name was registered by CAM IC International Limited, room 2006, 20F, Saige Square, Futian District, Shenzhen with a contact name listed as Arthur Chen and telephone number +86075583775474. The web site is merely a compilation of text and graphics taken from other web sites including the web site of CM Computer ([www.cmcomputer.com](http://www.cmcomputer.com)), which states that it is a leader in military VMEBus, I/O and ATR Chassis.

14. As detailed further in reftel B and below, CAM IC appears to be related to Winsuny Tech HK Ltd., the subject of a previous unfavorable EUC. During that related PSV, a Winsuny representative claimed that the items shipped to Winsuny from Rochester that were the subject of that EUC were destined for CAM IC. As further detailed in reftel B, that claim was almost certainly false. ECO notes that the director of Winsuny is listed as Chen, Long. ECO assumes this is the same Mr. Chen as CAM IC's Arthur Chen (listed as the domain holder contact name for CAM IC).

15. A review of the transaction documents for this shipment provided by OEA, CAM IC's ship-to address is the same address as Winsuny. That transaction documentation also lists a bill-to name as Techwing Elec Ltd., also at the same address. The Hong Kong Companies Registry does not include a listing for Techwing. The phone number included in the transaction documents is not operational. An additional ship-to address in the Rochester transaction documentation provided by OEA, namely Units 1-3, 7th Floor, Shing Yip Building, 19-21 Shing Yip Street, Kowloon, corresponds to the address of Aurora Business Centre, a corporate registration and hosting company ([www.abizctr.com](http://www.abizctr.com)).

16. Based on the information noted above, ECO believes that CAM IC

is an unsuitable recipient of U.S. origin controlled technology. ECO recommends that BIS reach out to Rochester to determine what information it had on hand when it shipped the items. Further, ECO requests that OEA confirm the 3A001 classification of the shipment so that ECO may reach out to Hong Kong TID concerning a potential violation of Hong Kong's export control rules in connection with this shipment. Finally, ECO recommends that CAM IC be added to the BIS Unverified List and/or Entities List.